

THE LAW OFFICE OF JEFF CHABROWE

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May 24, 2023

Hon. Mary Kay Vyskocil
 United States District Judge
 Southern District of New York
 500 Pearl Street, Room 2230
 New York, NY 10007
 (212) 805-0200
VyskocilNYSDChambers@nysd.uscourts.gov

Re: Consent Letter Motion to Extend Filing Deadlines
K2M Design v Schmidt et al., 22-cv-03069-MKV

Dear Judge Vyskocil:

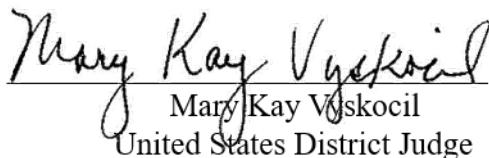
I represent Defendants Gene Lim and FilmWest Global Partnership LLC in the above matter. Currently, Defendants and Plaintiff K2M have a May 30 filing deadline for post-discovery motions. I request an extension of three weeks, until June 20, for both parties to file these motions. Plaintiff joins this request. I am preparing for a homicide trial in *People v. Williams*, Case No. 02146/2018, in Kings County Supreme Court. The trial was delayed because the district attorney was unable timely to gather police witnesses for this 2011 homicide. Pre-trial hearings are underway and jury selection starts May 30. We expect 20 days of trial. Based on the above, I request modification of the post-discovery schedule order to permit filing of the parties' post-discovery motions by June 20 or later. Thank you.


JEFFREY CHABROWE, ESQ. (NY #3001328)
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**Counsel for Gene Lim and FilmWest
Global Partnership LLC**

cc: Stewart Daniel Roll, Esq.
 sdanl@msn.com

Granted. SO ORDERED.

Date: 5/24/2023
 New York, New York


 Mary Kay Vyskocil
 United States District Judge